

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

**FILED**

AUG 10 1998

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U.S. DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

AMERICAN CANOE ASSOCIATION, INC., )

Plaintiff, )

UNITED STATES OF AMERICA, )

Plaintiff/Intervenor, )

v. )

Civil Action No.  
7:98-CV-4F(1)

MURPHY FARMS, INC. d/b/a )

MURPHY FAMILY FARMS, and )

D.M. FARMS OF ROSE HILL, L.L.C. )

Defendants. )

PROFESSIONAL PADDLESPORTS )

ASSOCIATION, )

Plaintiff, )

v. )

Civil Action No.  
7:98-CV-19-F(1)

MURPHY FARMS, INC. d/b/a )

MURPHY FAMILY FARMS, and )

D.M. FARMS OF ROSE HILL, L.L.C. )

Defendants. )

CONSERVATION COUNCIL OF NORTH )

CAROLINA )

Plaintiff, )

v. )

Civil Action No.  
7:98-CV-209-F(1)

MURPHY FARMS, INC. d/b/a )

MURPHY FAMILY FARMS, and )

D.M. FARMS OF ROSE HILL, L.L.C. )

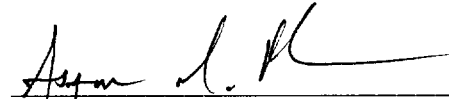
Defendants. )

UNITED STATES OF AMERICA'S MOTION FOR LEAVE  
TO FILE ITS COMPLAINT IN INTERVENTION  
INTRODUCTION

NOW COMES the United States of America, by and through the Attorney General of the United States and through its undersigned counsel, acting a the request and on behalf of the Administrator of the United States Environmental Protection Agency, and moves the Court pursuant to Federal Rule of Civil Procedure Rule 24(a) and Section 505(c)(2) of the Clean Water Act, 33 U.S.C. § 1365(c)(2), to permit the United States to intervene in the instant matter by filing and serving the attached proposed complaint in intervention. The grounds for this motion are fully explained in the United States of America's Memorandum in Support of the United States of America's Motion for Leave to File its Complaint in Intervention which is filed herewith.

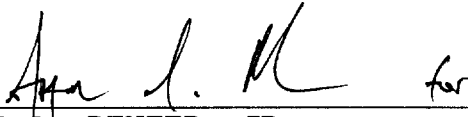
Respectfully submitted,

LOIS J. SCHIFFER  
Assistant Attorney General  
Environment and Natural Resources  
Division  
United States Department of Justice



ADAM M. KUSHNER  
Senior Counsel  
PAUL WOLFTEICH  
Trial Attorney  
Environmental Enforcement Section  
Environment and Natural Resources  
Division  
U.S. Department of Justice  
P.O. Box 7611  
Washington, D.C. 20044  
Telephone: (202) 514-4046  
Facsimile: (202) 514-2583

JANICE MCKENZIE COLE  
United States Attorney  
Eastern District of North Carolina

  
R.A. RENFER, JR.  
Assistant United States Attorney  
Chief, Civil Division  
310 New Bern Ave., Suite 800,  
Federal Building  
Raleigh, NC 27601-1461  
Telephone: (919) 856-4530  
Facsimile: (919) 856-4821

OF COUNSEL:

ADAM SOWATZKA  
Assistant Regional Counsel  
U.S. Environmental Protection  
Agency -- Region IV  
61 Forsyth Street  
Atlanta, GA 30303

CIANNAT HOWETT  
Attorney/Advisor  
U.S. Environmental Protection  
Agency  
Office of Enforcement and  
Compliance Assurance  
Mail Code 2243A  
401 M Street, S.W.  
Washington, D.C. 20460

**CERTIFICATE OF SERVICE**

I, Adam M. Kushner, hereby certify that a copy of the foregoing United States of America's Motion for Leave To File Its Complaint in Intervention, accompanying memorandum, and Complaint in Intervention was served by depositing a copy in the United States mail, postage prepaid, addressed to the following:

Carolyn Smith Pravlik, Esq.  
Terris, Pravlik, & Wagner  
1121 12<sup>th</sup> Street, N.W.  
Washington, D.C. 20005-4632

Joseph Gilbert, Esq.  
McNeil & Gilbert  
824 Gum Branch Road, Suite N  
Jacksonville, NC 28450

David Bookbinder, Esq.  
American Canoe Association, Inc.  
7432 Alban Station Boulevard  
Suite B-226  
Springfield, VA 22150-2311

Marsh Smith, Esq.  
Cunningham, Dedmond, Peterson & Smith, LLP  
225 North Bennett Street  
South Pines, NC 28387

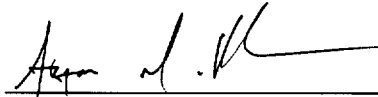
Charles C. Meeker  
John J. Butler  
Parker, Poe, Adams & Bernstein LLP  
PO Box 389  
150 Fayetteville Street Mall  
Suite 1400  
Raleigh, NC 27602-0389

Laurie B. Gengo  
The Sanford Holshauser Law Firm, PLLC  
PO Box 2447  
Raleigh, NC 27601

Reef C. Ivey  
Murphy Family Farms  
Route 2, Highway 117 South  
Rose Hill, NC 28458

Richard Schwartz  
Crowell & Moring  
1001 Pennsylvania Avenue, NW  
Washington, DC 20004-2595

Dated November 19, 1998, at Washington, D.C.

A handwritten signature in black ink, appearing to read "Adam M. Kushner", written over a horizontal line.

Adam M. Kushner  
Senior Counsel